

# Pollution Incident Response Management Plan

## 1. Purpose

This procedure outlines the steps to manage a pollution incident (generally a chemical spill) in order to minimise the potential for injury and damage to the environment. This plan is prepared to ensure the compliance to the relevant requirements in the Protection of the Environment Operations (POEO) Act and Protection of the Environment Operations (General) Regulation 2009 (the General Regulation). This plan should be reviewed and tested at least once a year and immediately after any incident that requires this procedure being enacted.

This PIRMP has been developed in conjunction to CRC's Emergency Response Plan (ERP), Emergency Evacuation Procedure, and Spill Response Procedure.

## 2. Scope

The procedure applies to any event that results in the uncontained spill of a hazardous substance within the CRC Industries manufacturing facility located at 9 Gladstone Rd, Castle Hill, NSW 2154.

ABN No: 77 000 725 833

## 3. Definition

|                    |   |
|--------------------|---|
| PIRMP              | Pollution Incident Response Plan  |
| EPA                | Environment Protection Authority  |
| Pollution Incident | An incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.  |
| Material Harm      | <p>(a) Harm to the environment is material if:</p> <ul style="list-style-type: none"><li>i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or</li><li>ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), It does not matter that harm to the environment is caused only in the premises where the pollution incident occurs</li></ul> <p>(b) Loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.</p> |

The definition above are based on the Dictionary of the POEO Act



#### 4. PIRMP Requirements Guidelines

Based on clause 98C(1) of the General Regulation 2009, PIRMP must include:

| Section | Detail required  | Related information in this document |
|---------|--|--------------------------------------|
| (a)     | A description of the hazards to human health or the environment associated with the activity to which the licence relates  | Section 5                            |
| (b)     | The likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood,  | Section 5                            |
| (c)     | details of the pre-emptive action to be taken to minimise or prevent any risk of harm to human health or the environment arising out of the relevant activity,   | Section 6                            |
| (d)     | an inventory of potential pollutants on the premises or used in carrying out the relevant activity,  | Section 7<br>Appendix 1              |
| (e)     | the maximum quantity of any pollutant that is likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the licence relates,  | Section 7<br>Appendix 1              |
| (f)     | a description of the safety equipment or other devices that are used to minimise the risks to human health or the environment and to contain or control a pollution incident,  | Section 8                            |
| (g)     | the names, positions and 24-hour contact details of those key individuals who:<br>(i) are responsible for activating the plan, and<br>(ii) are authorised to notify relevant authorities under section 148 of the Act, and<br>(iii) are responsible for managing the response to a pollution incident, | Section 9                            |
| (h)     | the contact details of each relevant authority referred to in section 148 of the Act,  | Section 9                            |
| (i)     | details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises in the vicinity of the premises to which the licence relates or where the scheduled activity is carried on,   | Section 11                           |
| (j)     | the arrangements for minimising the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried on,   | Section 11                           |
| (k)     | a detailed map (or set of maps) showing the location of the premises to which the licence relates, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of any stormwater drains on the premises,         | Section 12<br>Appendix 2,3,4,5,6,7   |
| (l)     | a detailed description of how any identified risk of harm to human health will be reduced, including (as a minimum) by means of early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce that risk,   | Section 5,6,7,8,14                   |
| (m)     | the nature and objectives of any staff training program in relation to the plan,   | Section 14                           |
| (n)     | the dates on which the plan has been tested and the name of the person who carried out the test,   | Appendix 8                           |
| (o)     | the dates on which the plan is updated,  | Appendix 8                           |
| (p)     | the manner in which the plan is to be tested and maintained.   | Section 15                           |



## 5. Potential Hazard

Potential hazards at the premises are:

- Toxic or explosive atmosphere build up during manufacture
- Static electrical charge build up
- Underground storage tanks leaking into surrounding soils and strata
- Pumps that relay product from underground tanks to the production plant leaking
- Propellant tanks leaking to atmosphere
- Bulk containers of chemicals spilling in transit onsite
- Bulk deliveries from tankers leaking onsite
- Bulk stored containers of chemicals on site
- Hoses and pumps leaking
- Finished goods in transit store leaking
- Spills onsite entering stormwater that may enter a local creek
- Fire

All of potential hazards at CRC have been carefully identified, and where possible, controls have been put in place to minimise the risks. Supporting documents are as follow:

- Risk Assessment Register
- Safe Work Method Statement (SWMS)
- Safety Data Sheet (SDS)

These documents are available on CRC's compliance software.

## 6. Pre-emptive Actions

- Toxic or explosive atmosphere build up during manufacture – Wherever there is a possibility of an occurrence thru mechanical failure or other cause, the following measures are in place:
  - Gas detection with audible and visual indication is in place
  - Automated shutdown of electrical equipment is activated
  - Powered extraction with fresh air change-over is in place
- Static electrical charge build up:
  - Staff have been provided with cotton uniforms and Electric Static Dissipative footwear
  - ESD Testing station installation
  - Staff have been trained in Static Awareness (Recorded in the Compliance Software)
  - All machinery is connected back to a common grounding point
  - All blending tanks are connected back to a common grounding point
  - All blending tanks are filled from the base
  - All blending hoses are inspected and tagged yearly
  - All blending vessels are inspected and tagged yearly
  - Tanker bonding is on site and a procedure is in place that ensures tankers are bonded prior to connection for unloading
- Underground storage tanks leaking into surrounding soils and strata:
  - Monitoring wells are checked (and recorded) for signs of hydrocarbons every six months
  - Monitoring wells are checked (and recorded) for depth every six months



- Underground tanks are integrity tested every 5 years by a certified third party
- Pumps that relay product from underground tanks to the production plant leaking:
  - Pumps are in a resin bunded area
  - Pump bunding has a rain cover to stop build-up of rainwater
  - Pumps are included in a regular maintenance program
  - Pumps are behind a locked gate with a “code 003” fire and rescue lock
- Propellant tanks leaking to atmosphere:
  - Tanks undergo an external inspection bi-annually by a certified third party
  - Tanks undergo an internal vacuum test and inspection every 10 years by a certified third party
  - A gas detection system is installed around the tank farm perimeter that shuts all electric, pumps and valves down if a leak is detected
  - The gas detection system is calibrated every three months by a certified third party
- Bulk containers of chemicals spilling in transit onsite-
  - Multiple Spill Kits are available at strategic locations on site
  - Drain covers available on site
  - All staff are regularly trained in spill response actions
  - Site has drain intercept point which can be quickly shut at any time (Appendix 3)
  - Bulk Chemical Delivery (Tanker Unloading) Procedure
- Bulk deliveries from tankers leaking onsite –
  - A procedure and checklist are in place that requires drain mats be placed over drains prior to any tanker connecting to our site
  - Multiple Spill Kits are available at strategic locations on site
  - All staff are regularly trained in spill response actions
  - Site has drain intercept point which can be quickly shut at any time (Appendix 3)
  - Bulk Chemical Delivery (Tanker Unloading) Procedure
- Bulk stored containers of chemicals on site, Hoses and pumps leaking and Finished goods in transit store leaking –
  - All chemicals are contained in bunded spaces and are segregated if they are non-compatible
  - All filling and blending areas are bunded to contain the maximum spill requirements of quantity of product for that area
  - Hoses and pumps are only used in bunded areas

Finished goods are picked up on a daily basis to reduce risk and all finished flammable goods onsite are stored to meet Safe Work Australia Guidelines at the end of the production shift. Aerosols are all caged and flammables stored in Flammable Goods Cabinets or respective Dangerous Goods Class Stores
- Spills onsite entering stormwater that may enter a local creek –
  - Multiple Spill Kits are available at strategic locations on site
  - All staff are regularly trained in spill response actions
  - Site has drain intercept point which can be quickly shut at any time (Appendix 3)
  - Chief fire warden trained for relevant incidents

- Fire –
  - All staff trained with use of fire extinguishers by Fire & Rescue NSW bi-annually
  - All fire fighting equipment is tested and tagged by a certified third party every six months
  - All equipment in Zone 1 Hazardous areas is flameproof and intrinsically safe
  - Gas Detection and shutdown systems are installed in all Zone 1 Hazardous areas
  - Gas Detection Systems are calibrated every three months by a certified third party
  - Thorough static controls are in place throughout the production area
  - Annual Fire Safety Statement is supplied for the site to council yearly
- Regular inspections
  - Daily Shut Down Checklist (all working days)
  - Daily Forklift Inspection (all working days)
  - Office WHS Inspection (monthly)
  - Production WHS Inspection (monthly)

All pre-emptive actions are scheduled as scheduled activities and all records are maintained in our compliance software or in local network folders.

## 7. Inventory of Pollutants


CRC receipts, stores, handles, and uses a large number and range of chemicals. There are a number of comprehensive systems used at CRC to ensure safe handling are in place at all times. The systems include:

- Safety Data Sheets available at all times (soft and hard copies)
- Dangerous Goods and Hazardous Substances Manifest and Notification Report (provided to SafeWork NSW)
- Regular staff training
- Workplace inspection
- Safety and quality audit

Appendix 1 provides a list of pollutants at the premises.

## 8. Safety Equipment

- Spill kits are located strategically around the site. Staff are regularly trained in the proper use of these spill kits and reporting of spills. Spill kits are maintained regularly.
- PPE, including: safety glass, ear plugs, respirator, gloves, protective clothing, etc
- Drain mats are used as procedure prior to any tanker connecting to unload
- SDSs for all raw materials are located in the first aid room in hard copy form and in our compliance software (for soft copy)
- SDSs for all raw materials and finished goods are located in the Hazmat Box (in USB Stick)
- Gas detection shutdown and warning systems are in place in all hazardous areas
- Fire panel has been fitted to the building with detection in all hazardous areas, offices and roof cavities
- The site is Bunded and all drainage on site is directed through a drain intercept that can be easily closed at any time (See appendix 3)
- Firefighting equipment is installed at strategic locations around the site (See appendix 4)

|   |   |                              |             |              |
|---|---|------------------------------|-------------|--------------|
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|   | Printed documents are uncontrolled          |                              |             |              |

- Eye wash and Emergency Showers are installed around the site (See appendix 5)

## 9. Contact Details

For **DIRECT mobile contact** numbers Call **Calamity Security on 1300 300 247** and advise them that the PIRMP needs to be enacted.

| Castle Hill Production                           | Contact   |
|--|---|
| Environment Health & Safety Officer              | Reuben Etuale<br>Office direct: (02) 9849 6731<br>Email: reuben.etuale@crcind.com |
| Chief Fire Warden                                | Colin Gurney<br>Office direct: (02) 9849 6728<br>Email: colin.gurney@crcind.com   |
| Director of Operations and Supply Chain, AsiaPac | Sasha Papac<br>Office direct: (02) 9849 6725<br>Email: sasha.papac@crcind.com     |

| Regulatory Bodies                      | Contact   |
|--|---|
| Environment Protection Authority (EPA) | 131 555<br><a href="http://www.epa.nsw.gov.au/reporting-and-incidents/incident-management/reporting-and-managing-incidents">www.epa.nsw.gov.au/reporting-and-incidents/incident-management/reporting-and-managing-incidents</a> |
| Fire & Rescue NSW                      | In an Emergency Call <b>000</b><br>Hazardous Materials Response<br>50 Lancaster St, Ingleburn 2565<br>Tel: (02) 9605 5702   |
| SafeWork Australia NSW                 | 13 10 50<br><a href="http://www.safework.nsw.gov.au/notify-safework/incident-notification">www.safework.nsw.gov.au/notify-safework/incident-notification</a>  |
| NSW Health                             | (02) 9391 9000<br><a href="http://www.health.nsw.gov.au">www.health.nsw.gov.au</a>  |
| The Hills Shire Council                | Health & Environmental Protection<br>(02) 9843 0555<br><a href="https://www.thehills.nsw.gov.au">https://www.thehills.nsw.gov.au</a>  |



## 10. Communication with Neighbours and Local Community

- CRC Industries is located on a corner block in an Industrial area. The closest neighbours are **“Australian Pump”** who is located to the East along Gladstone Road, and **“Usana”** who is located to the North along Hudson Avenue. Both neighbours would be considered “Down Hill” in a geographical sense. There are no Hospitals, Nursing Homes, Schools, or pre-schools within a kilometre of the Factory. There are, however, food shops, a bowling alley and other factory units. In the event of a major incident, the chief fire warden or person in charge will delegate the task of communication with the neighbouring businesses.
  - Australian Pump, 7 Gladstone Rd Castle Hill – 02 8865 3500
  - Usana, 3 Hudson Ave Castle Hill – 02 9842 4600
- Communications with the community and or media would be made by the Trans-Tasman Head of Marketing
- **For DIRECT mobile contact** number Call **Calamity Security on 1300 300 247** and advise them that the PIRMP needs to be enacted.

|                                       |  |
|---------------------------------------|--|
| <b>Trans-Tasman Head of Marketing</b> | <b>Dr Adam Gaskill</b><br><b>Office Direct: +64 9272 2702</b><br><b>Email: adam.gaskill@crcind.com</b> |
|---------------------------------------|--|



## 11. Minimising harm to persons on the premises

CRC has implemented the below processes/measures in the effort to minimise and prevent harm to persons on the premises:

- Emergency Response Plan (ERP)  
Should an incident occur that could possibly harm or put at risk any personnel at CRC at the time, the alarm will be activated and as per our “Emergency Response Plan”. All staff not involved with the Emergency Response Duties will immediately evacuate the premises and muster at the flag poles on the corner of Gladstone Rd and Hudson Avenue.  
Emergency procedure is outlined in Section 2 of the ERP
- Implementation of SOP, Safe Work Method Statement (SWMS), and risk assessment  
Appropriate training using SOP, SWMS, and risk assessment matrix are provided to staff
- Provide the required PPE  
PPE and basic clean-up resources are available at all times at the premises
- Pre-Emptive actions as outlined in Section 6

If anyone at CRC premises need any urgent medical help/advice/toxicology consultation, below are the contact numbers:

- If there is a need for urgent medical help, DIAL 000
- If there is a need for Medical Advice, Contact “Poisons Information 24 hour Hot Line” on 13 11 26 and have the appropriate SDS handy.
- If there is a need for expert consultation on Toxicology or environmental impact contact John Sokolich on +64 9272 2712
- **For DIRECT mobile contact** number Call **Calamity Security on 1300 300 247** and advise them that the PIRMP needs to be enacted.

|   |   |
|---|---|
| <b>Trans-Tasman<br/>Technical Manager</b> | <b>John Sokolich</b><br><b>Office Direct: +64 9272 2712</b><br><b>Email: john.sokolich@crcind.com</b> |
|---|---|

## 12. Maps

Maps are shown in the appendix section as listed below.

- Appendix 2 – Location of Site
- Appendix 3 – Drainage & Stormwater Drain Intercept Point
- Appendix 4 – Emergency Response Equipment
- Appendix 5 – Emergency Eyewash & Shower Locations
- Appendix 6 – Location of Potential Pollutants
- Appendix 7 – Storm Water Entry to Local Creek



### 13. Actions to be taken during or immediately after a pollution incident

The major vs and minor spill are determined based on the table below:

| Material Type                           | Spill Quantity |            |             |              |         |
|---|----------------|------------|-------------|--------------|---------|
|   | 1 -20 L        | 20 - 100 L | 100 - 205 L | 205 - 1000 L | >1000 L |
| Non DG, e.g. Water, Non DG Chemicals    | Minor          | Minor      | Minor       | Minor        | Major   |
| DG Class 3, e.g. Solvent                | Minor          | Major      | Major       | Major        | Major   |
| DG Class 6, e.g. Perch, Methyl Chloride | Minor          | Major      | Major       | Major        | Major   |
| DG Class 8, e.g. Acids, Ammonia         | Minor          | Major      | Major       | Major        | Major   |

Actions to be taken during or immediately after the incident are as follow:

- Major Spill
  - Contain the spill if possible, using a Spill Containment Kit, and/or drain mats. Use PPE.
  - Close the drain intercept to prevent spill escaping site.
  - Raise the alarm – Contact Fire Warden or Chief Fire Warden. They will order evacuation of non-essential persons from the area or order evacuation of the site.
  - Chief Fire Warden will enact our ERP (Emergency Response Plan) if deemed necessary.
  - Chief Fire Warden will contact Ambulance, NSW Fire & Rescue or Police if required.
  - Chief Fire Warden will have a copy of all information in the Hazmat box on hand for Fire & Rescue if required.
  - Isolate any contaminated individuals for treatment by a qualified First Aider as per SDS.
  - EHS Committee will conduct an internal investigation and report on the incident as a matter of Continuous Improvement and put into place measures to avoid a recurrence of the incident.
  - EHS Committee Manager will self-report the incident to the EPA, Fire & Rescue NSW, Safe Work Australia, Local Council, Ministry of Health and the Office of Environment and Heritage as deemed appropriate.
- Minor Spill
  - Contain the spill using a Spill Containment Kit or other appropriate materials. Use PPE.
  - Isolate the spill/hazard with a physical barrier.
  - Identify the chemical or hazard and follow SDSs when handling the spill/hazard.
  - Use the information from the SDSs of the materials to judge response and/or evacuation procedures.
  - Notify the Supervisor and/or the Chief Fire Warden.
  - Clean the spill/hazard as deemed appropriate.
  - Record the spill in the Spill register with the requested form details.

Regardless of the size of the spill the EHS Committee will conduct an internal investigation and record the incident as a matter of Continuous Improvement and put into place measures to avoid a recurrence of the incident.



#### 14. Staff Training

- All staff training records are maintained in our compliance software. Records include: training date, employee name, training type, recurrency and any related proof
- Weekly toolbox talks are held every Monday morning with production staff.
- Spill containment and awareness training is conducted every 2 years by an external supplier
- First Attack Fire Fighting training is conducted by Fire & Rescue NSW every 2 years to keep staff up to date with current techniques in fighting small fires and use of extinguishers.
- Fire Drills are conducted quarterly and recorded internally within our Microsoft Teams EHS online folder.

#### 15. Testing and Updating The PIRMP

- The PIRMP shall be tested at least once every 12 months and within one month of any pollution incident occurring
- PIRMP can be tested using 2 methods: a desktop audit or scenario, and practical exercises or drills
- The PIRMP shall be reviewed at least once every 12 months or when changes in personnel/equipment or plant relevant to this document change and immediately after any incident that requires this procedure being enacted
- PIRMP Testing and Reviews record are outlines in Appendix 8
- PIRMP will be tested by at least 2 staff members inclusive of 1 EHS team member using the following techniques
  - Tabletop office audit, and
  - Workplace “Mockup” of an actual spill or incident in real time at our premises
- Records to be taken during this process and recorded in our compliance software



## 16. Appendixes

### • Appendix 1 – Hazardous Chemical List

| Storage Area | D3FO #  | Legacy # | Description                   | Typical Qty | Maximum Qty | UoM |
|--------------|---------|----------|-------------------------------|-------------|-------------|-----|
| 10           | 1002366 | 00348    | IRGANOX L-64*SMALL-NOX L-64C  | 10          | 40          | kg  |
| 10           | 1020525 | R0403    | Methanol                      | 63          | 203         | L   |
| 10           | 1007759 | R0208    | Clear Urethane RTL            | 100         | 200         | L   |
| 10           | 1020414 | R0004    | Butanol                       | 100         | 200         | L   |
| 10           | 1020515 | R0350    | Spiridane D30                 | 100         | 150         | L   |
| 10           | 1020526 | R0404    | Cyclohexanone                 | 160         | 250         | L   |
| 10           | 1020556 | R0508    | ThixoCal 7000E                | 180         | 541         | L   |
| 10           | 1007755 | R0025    | Trans-1,2-Dichloroethylene    | 250         | 400         | L   |
| 10           | 1020442 | R0075    | Diacetone Alcohol             | 300         | 400         | L   |
| 10           | 1020516 | R0351    | Dowanol Glycol Ether DPM      | 390         | 780         | kg  |
| 10           | 1020504 | R0310    | White Spirits                 | 400         | 2,000       | L   |
| 10           | 1020509 | R0316    | Ethanol                       | 400         | 1,200       | L   |
| 10           | 1020523 | R0401    | Xylene                        | 400         | 1,600       | L   |
| 10           | 1020524 | R0402    | Toluene                       | 400         | 1,200       | L   |
| 10           | 1020563 | R0516    | D Limonene                    | 400         | 1,600       | L   |
| 10           | 1020539 | R0434    | Methoxypropyl Acetate         | 412         | 619         | L   |
| 10           | 1010881 | 69058    | CHEM - DDAC 80% / BARDAC 2280 | 413         | 821         | L   |
| 10           | 1020448 | R0093    | Dowanol PM Glycol Ether       | 413         | 1,239       | L   |
| 10           | 1020499 | R0303    | Mineral Turpentine            | 600         | 4,000       | L   |
| 10           | 1020554 | R0500    | ThixoCal 3000A                | 600         | 1,200       | L   |
| 10           | 1020528 | R0406    | Methyl Ethyl Ketone           | 700         | 800         | L   |
| 10           | 1020510 | R0319    | IPA                           | 764         | 1,911       | L   |
| 10           | 1020430 | R0051    | Alox 2140 53%                 | 800         | 930         | L   |
| 10           | 1020532 | R0413    | Solvent D40                   | 826         | 1,652       | L   |
| 10           | 1020505 | R0311    | IMS100 Ethanol                | 1,000       | 2,000       | L   |
| 10           | 1020428 | R0040    | Acetone                       | 1,600       | 4,300       | L   |
| 10           | 1020438 | R0065    | Solvent N10                   | 2,078       | 4,156       | L   |
| 10           | 1020514 | R0349    | Heptane                       | 3,000       | 6,000       | L   |
| 10           | 1020503 | R0308    | Diethyl Ether                 | 4,650       | 4,650       | L   |
| 11           | 1002318 | R0010    | Perchloroethylene             | 800         | 3,200       | L   |
| 11           | 1020530 | R0409    | Methyl Chloride               | 1,600       | 3,500       | L   |
| 12           | 1020456 | R0116    | Mergal K14                    | 10          | 25          | kg  |
| 12           | 1020928 | R0267    | Dissolvine GI-47-s            | 200         | 300         | kg  |
| 12           | 1020454 | R0110    | LABSA Dobanic Acid            | 284         | 455         | L   |
| 13           | 1020508 | R0314    | Ammonia Aqueous               | 22          | 44          | L   |
| 13           | 1020522 | R0369    | Disparlon 6900-20X            | 150         | 300         | kg  |



|              |         |         |                                     |       |        |    |
|--------------|---------|---------|-------------------------------------|-------|--------|----|
| 13           | 1020480 | R0210   | Isohexane                           | 6,000 | 11,500 | L  |
| 13           | 1020297 | C0006   | C-C3 RTL                            | 8,000 | 14,000 | L  |
| AGT (3)      | 1020476 | R0200   | Carbon Dioxide                      | 3,000 | 4,500  | L  |
| AGT (7)      | 1020481 | R0212   | B45 Hydrocarbon                     | 3,000 | 7,200  | L  |
| AGT (8,9)    | 1020482 | R0213   | B75 Hydrocarbon                     | 6,000 | 14,400 | L  |
| Bottle Line  | 1020462 | R0134   | Preventol On Extra                  | 8     | 19     | kg |
| Bottle Line  | 1020550 | R0450   | Lemon A 300-550-20                  | 22    | 28     | L  |
| Bottle Line  | 1020544 | R0440   | Caustic Soda 40%                    | 192   | 331    | L  |
| Bottle Line  | 1020546 | R0442   | Diethanolamine 85%                  | 200   | 250    | kg |
| DG Cabinet   | 1020432 | R0054   | Bubblegum Fragrance                 | 20    | 40     | L  |
| DG Cabinet   | 1020475 | R0186   | KAF 1711 Fragrance                  | 20    | 40     | kg |
| DG Cabinet   | 1020531 | R0412   | Masking Fragrance                   | 22    | 43     | L  |
| Non DG Store | 1020483 | R0215   | Yellow Dye                          | 5     | 25     | kg |
| Non DG Store | 1002367 | 00351   | IRGALUBE TPPT*SMALL-LUBETPPT-C      | 10    | 40     | kg |
| Non DG Store | 1002766 | 00744   | IRGALUBE 349*SMALL-LUBE 349-C       | 10    | 40     | kg |
| Non DG Store | 1020445 | R0087   | Microwax                            | 10    | 25     | kg |
| Non DG Store | 1020471 | R0166   | Red Thyme Oil                       | 10    | 20     | kg |
| Non DG Store | 1020472 | R0167   | Masking Compound                    | 10    | 20     | kg |
| Non DG Store | 1020486 | R0219   | Siana Perfume                       | 10    | 25     | kg |
| Non DG Store | 1020533 | R0416   | Paraffin Wax 50J                    | 10    | 30     | kg |
| Non DG Store | 1020545 | R0441   | Caramel Hgp                         | 10    | 25     | kg |
| Non DG Store | 1002217 | R0046   | Blue Dye                            | 20    | 25     | kg |
| Non DG Store | 1011508 | R0092   | Wintrol B-F Benzotriazole Flake     | 20    | 40     | kg |
| Non DG Store | 1020436 | R0060   | Deodall No 1                        | 20    | 50     | kg |
| Non DG Store | 1020457 | R0120   | Gum Tragacanth Reg 400              | 20    | 40     | kg |
| Non DG Store | 1020458 | R0121   | Span 20                             | 20    | 100    | kg |
| Non DG Store | 1020534 | R0417   | Methocel 311                        | 20    | 40     | kg |
| Non DG Store | 1020535 | R0418   | Brilliant Blue FCF                  | 20    | 25     | kg |
| Non DG Store | 1020536 | R0421   | Xiameter AFE-0400 Antifoam Emulsion | 20    | 40     | kg |
| Non DG Store | 1020547 | R0446   | Perlastan L30                       | 20    | 40     | kg |
| Non DG Store | 1020551 | R0453   | Acid Light Yellow                   | 20    | 60     | kg |
| Non DG Store | 1752349 | 1752349 | Hydrocer Emulsion                   | 20    | 40     | kg |
| Non DG Store | 1002365 | 00346   | GLYCEROL TRI OLEATE*KEMESTER        | 25    | 50     | kg |
| Non DG Store | 1020416 | R0008   | Hydroxyethyl Cellulose              | 25    | 50     | kg |
| Non DG Store | 1020434 | R0056   | Chisorb 5530                        | 25    | 50     | kg |
| Non DG Store | 1020450 | R0096   | Eternabrite 651-1 Alumi Paste       | 25    | 25     | kg |
| Non DG Store | 1020466 | R0151   | Shellsol D60                        | 25    | 50     | L  |
| Non DG Store | 1020485 | R0218   | Vanilla Shake Perfume               | 25    | 50     | kg |
| Non DG Store | 1020506 | R0312   | Sodium Nitrite                      | 25    | 75     | kg |



|              |         |       |                            |     |     |    |
|--------------|---------|-------|----------------------------|-----|-----|----|
| Non DG Store | 1020517 | R0361 | Alpex CK450                | 25  | 25  | kg |
| Non DG Store | 1020521 | R0365 | BYK 410                    | 25  | 25  | kg |
| Non DG Store | 1011593 | 68017 | CHEM - CABOSIL TS720       | 30  | 100 | kg |
| Non DG Store | 1020451 | R0098 | Chroma-Chem White 6 (DINP) | 40  | 100 | kg |
| Non DG Store | 1020549 | R0449 | Wax KLE 20%                | 40  | 40  | kg |
| Non DG Store | 1007760 | R0506 | Polysilicone PCR           | 50  | 100 | kg |
| Non DG Store | 1007761 | R0509 | Molyvan L                  | 50  | 100 | kg |
| Non DG Store | 1020443 | R0085 | Hikotack P120              | 50  | 100 | kg |
| Non DG Store | 1020453 | R0109 | Sodium Benzoate            | 50  | 100 | kg |
| Non DG Store | 1020460 | R0124 | Diatomite D63              | 50  | 100 | kg |
| Non DG Store | 1020469 | R0163 | Tallow                     | 50  | 150 | kg |
| Non DG Store | 1020484 | R0217 | Auto Kolone Perfume        | 50  | 100 | kg |
| Non DG Store | 1020493 | R0261 | Borax Pentahydrate         | 50  | 100 | kg |
| Non DG Store | 1020507 | R0313 | Polybutene PB2400          | 50  | 100 | kg |
| Non DG Store | 1020511 | R0321 | Sodium Gluconate           | 50  | 100 | kg |
| Non DG Store | 1020518 | R0362 | Di-2-Ethylhexyl Phthalate  | 50  | 50  | kg |
| Non DG Store | 1020537 | R0428 | Sodium Bicarbonate         | 50  | 100 | kg |
| Non DG Store | 1020548 | R0448 | Sodium Sulphate Anhydrous  | 50  | 100 | kg |
| Non DG Store | 1020926 | R0265 | Sodium Citrate             | 50  | 100 | kg |
| Non DG Store | 1020927 | R0266 | Citric Acid Monohydrate    | 50  | 150 | kg |
| Non DG Store | 1020561 | R0514 | Silicone Fluid 10000 CS    | 70  | 200 | kg |
| Non DG Store | 1000392 | R0433 | Liquitint Brilliant Orange | 100 | 200 | kg |
| Non DG Store | 1020435 | R0057 | Rhodoline DP 226/40        | 100 | 200 | kg |
| Non DG Store | 1020439 | R0069 | PAO8                       | 100 | 200 | kg |
| Non DG Store | 1020440 | R0070 | PAO40                      | 100 | 200 | kg |
| Non DG Store | 1020441 | R0072 | Bentone SD1                | 100 | 200 | kg |
| Non DG Store | 1020444 | R0086 | Hypax 450                  | 100 | 200 | kg |
| Non DG Store | 1020449 | R0094 | White Lithium Grease       | 100 | 200 | kg |
| Non DG Store | 1020455 | R0111 | Decolamide FAG             | 100 | 200 | kg |
| Non DG Store | 1020468 | R0161 | Neatsfoot Oil TP 110       | 100 | 200 | kg |
| Non DG Store | 1020470 | R0164 | Neatsfoot Oil TP 120       | 100 | 200 | kg |
| Non DG Store | 1020473 | R0169 | BHT-Food Grade             | 100 | 200 | kg |
| Non DG Store | 1020474 | R0185 | Orisurf La8                | 100 | 200 | kg |
| Non DG Store | 1020490 | R0256 | Lubrizol 5318B             | 100 | 400 | kg |
| Non DG Store | 1020494 | R0262 | Lubrizol 7077R             | 100 | 400 | kg |
| Non DG Store | 1020496 | R0264 | Nanoflon PAO30             | 100 | 200 | kg |
| Non DG Store | 1020497 | R0301 | Fatty Alcohol Tech 9/6     | 100 | 200 | kg |
| Non DG Store | 1020498 | R0302 | Pine Oil 85%               | 100 | 200 | kg |
| Non DG Store | 1020527 | R0405 | Butyl Glycol Ether         | 100 | 200 | kg |
| Non DG Store | 1020529 | R0408 | Gardinol ESB               | 100 | 200 | kg |



|              |         |         |                        |       |       |    |
|--------------|---------|---------|------------------------|-------|-------|----|
| Non DG Store | 1020558 | R0510   | Hitec 151              | 100   | 200   | kg |
| Non DG Store | 1020559 | R0511   | Lanolin Anhydrous USP  | 100   | 200   | kg |
| Non DG Store | 1752534 | 1752534 | Crodacor BE-LQ-(AP)    | 100   | 200   | kg |
| Non DG Store | 1011509 | R0026   | Sulfomed A450          | 150   | 400   | kg |
| Non DG Store | 1020426 | R0035   | Glycerine USP          | 150   | 250   | kg |
| Non DG Store | 1020459 | R0123   | Polysorbate 20         | 150   | 300   | kg |
| Non DG Store | 1020495 | R0263   | Additin 3038           | 150   | 200   | kg |
| Non DG Store | 1020512 | R0322   | Stepsol MET-10U        | 150   | 400   | kg |
| Non DG Store | 1020565 | R0525   | Silicone Fluid 100 CS  | 150   | 200   | kg |
| Non DG Store | 1020566 | R0526   | Silicone Fluid 1000 CS | 150   | 200   | kg |
| Non DG Store | 1007757 | R0055   | Viscoplex 8-219        | 200   | 200   | kg |
| Non DG Store | 1020419 | R0016   | Methyl Salicylate      | 200   | 300   | kg |
| Non DG Store | 1020437 | R0063   | Nyflex 804 D1182       | 200   | 400   | kg |
| Non DG Store | 1020452 | R0101   | Dissolvine NA          | 200   | 400   | kg |
| Non DG Store | 1020491 | R0257   | Nyflex 222B D1182      | 200   | 400   | kg |
| Non DG Store | 1011506 | R0003   | Sorbitan Mono Oleate   | 250   | 400   | kg |
| Non DG Store | 1020427 | R0038   | Solvent D110           | 250   | 400   | L  |
| Non DG Store | 1011504 | R0024   | Petroleum Jelly Amber  | 350   | 500   | kg |
| Non DG Store | 1020564 | R0523   | Silicone Fluid 350 CS  | 350   | 800   | kg |
| Non DG Store | 1020446 | R0091   | Tergitol NP6           | 400   | 1,000 | L  |
| Non DG Store | 1020500 | R0304   | Ixosurf NP5            | 400   | 800   | kg |
| Non DG Store | 1020562 | R0515   | Gear Oil 85W/140       | 400   | 800   | L  |
| Non DG Store | 1020418 | R0012   | Aihai Talc PV30        | 500   | 1,000 | kg |
| Non DG Store | 1020467 | R0160   | Process Oil 1000 Green | 500   | 1,000 | kg |
| Non DG Store | 1000393 | R0436   | Videt Q3               | 816   | 1,632 | kg |
| Non DG Store | 1011507 | R0029   | Dimer Acid             | 950   | 1,900 | kg |
| Non DG Store | 1011505 | R0005   | Chem - Butyl Stearate  | 1,050 | 2,100 | kg |
| Non DG Store | 1000440 | R0439   | SW-4 Concentrate       | 1,500 | 3,000 | kg |
| Non DG Store | 1020519 | R0363   | Zinc Dust              | 2,000 | 2,000 | kg |
| Non DG Store | 1752933 | 1752933 | Cutmax 226S            | 50    | 1,440 | kg |



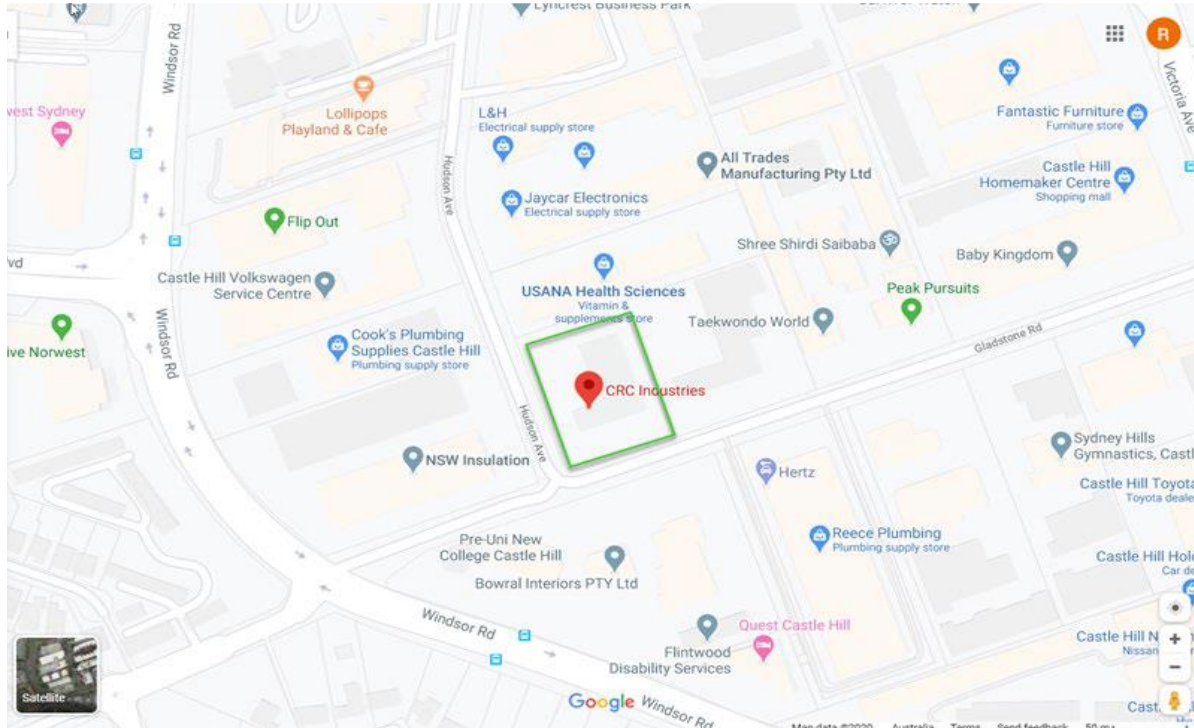
|              |         |         |                               |        |         |    |
|--------------|---------|---------|-------------------------------|--------|---------|----|
| Non DG Store | 1753140 | 1753140 |                               | 500    | 900     | kg |
|              |         |         | RBDW High Oleic Sunflower Oil |        |         |    |
| SR           |         |         | Aerosols                      | 5,000  | 6,000   | L  |
| Storage Area | 1020487 | R0220   | Marine Fresh Perfume          | 20     | 60      | kg |
| Storage Area | 1020513 | R0323   | Acticide HF                   | 24     | 49      | L  |
| UST (1)      | 1020420 | R0022   | Vivasol 2046                  | 50,000 | 110,000 | L  |
| UST (2)      | 1020425 | R0032   | Base Oil 150                  | 10,000 | 20,000  | L  |
| UST (4)      | 1020502 | R0307   | Petrol Unleaded               | 10,000 | 20,000  | L  |
| UST (5)      | 1020348 | M0321   | CRC Aerostart RTL             | 10,000 | 20,000  | L  |



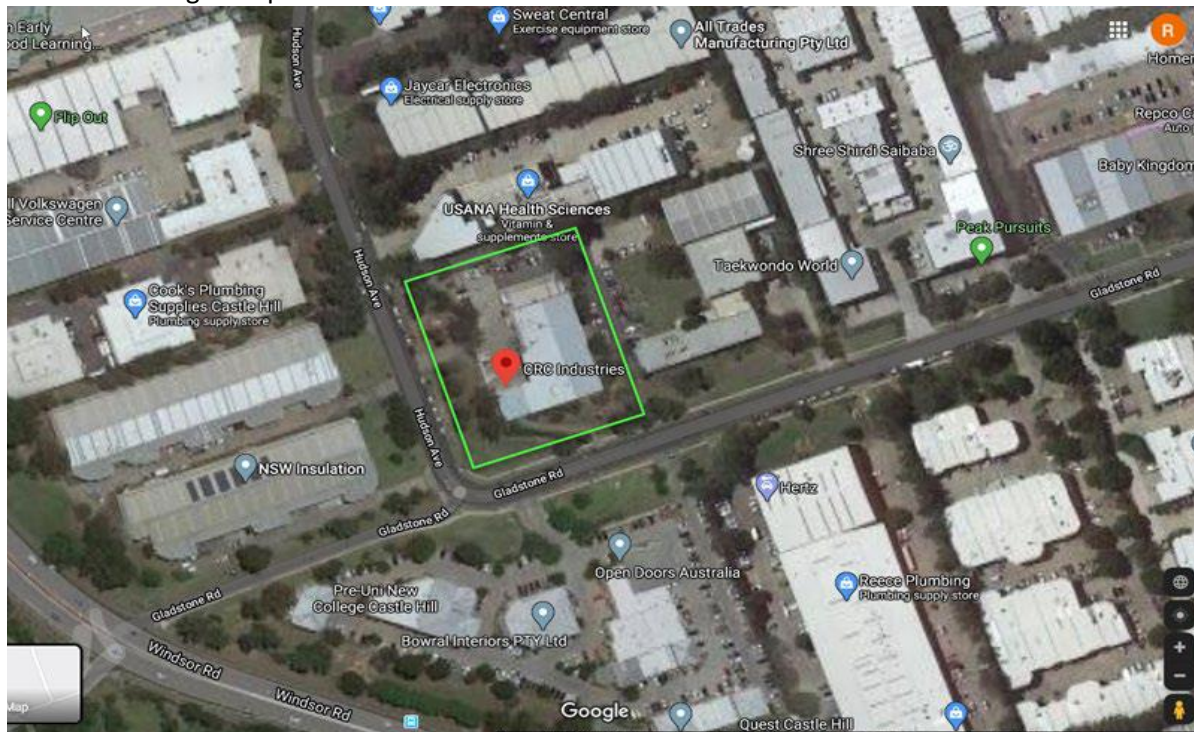


- **Appendix 2 – Location of Site**

Location - CRC Industries, 9 Gladstone Road, Castle Hill, NSW 2154, Australia




Location – Google Map View



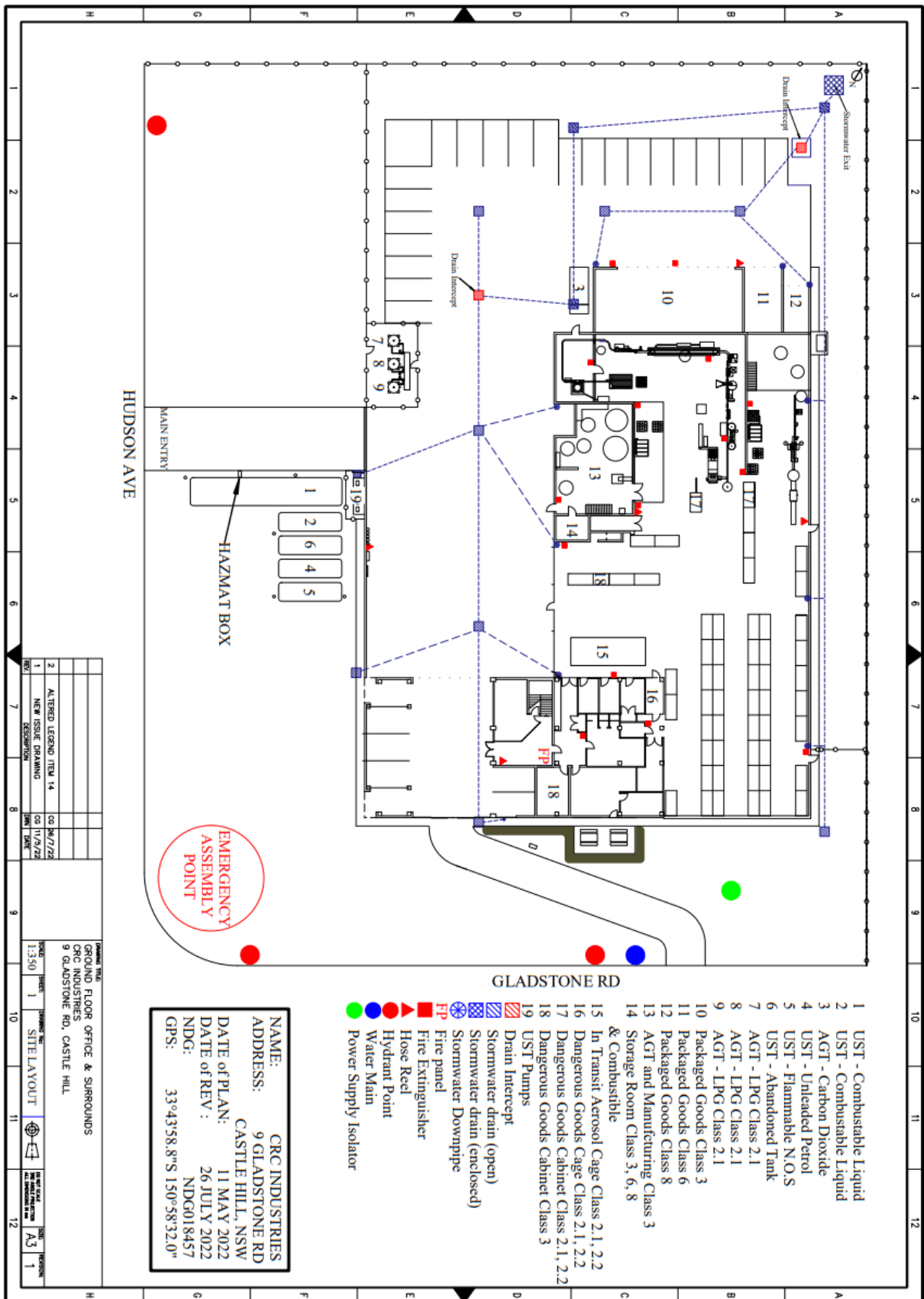
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Longitude: 151.00899°

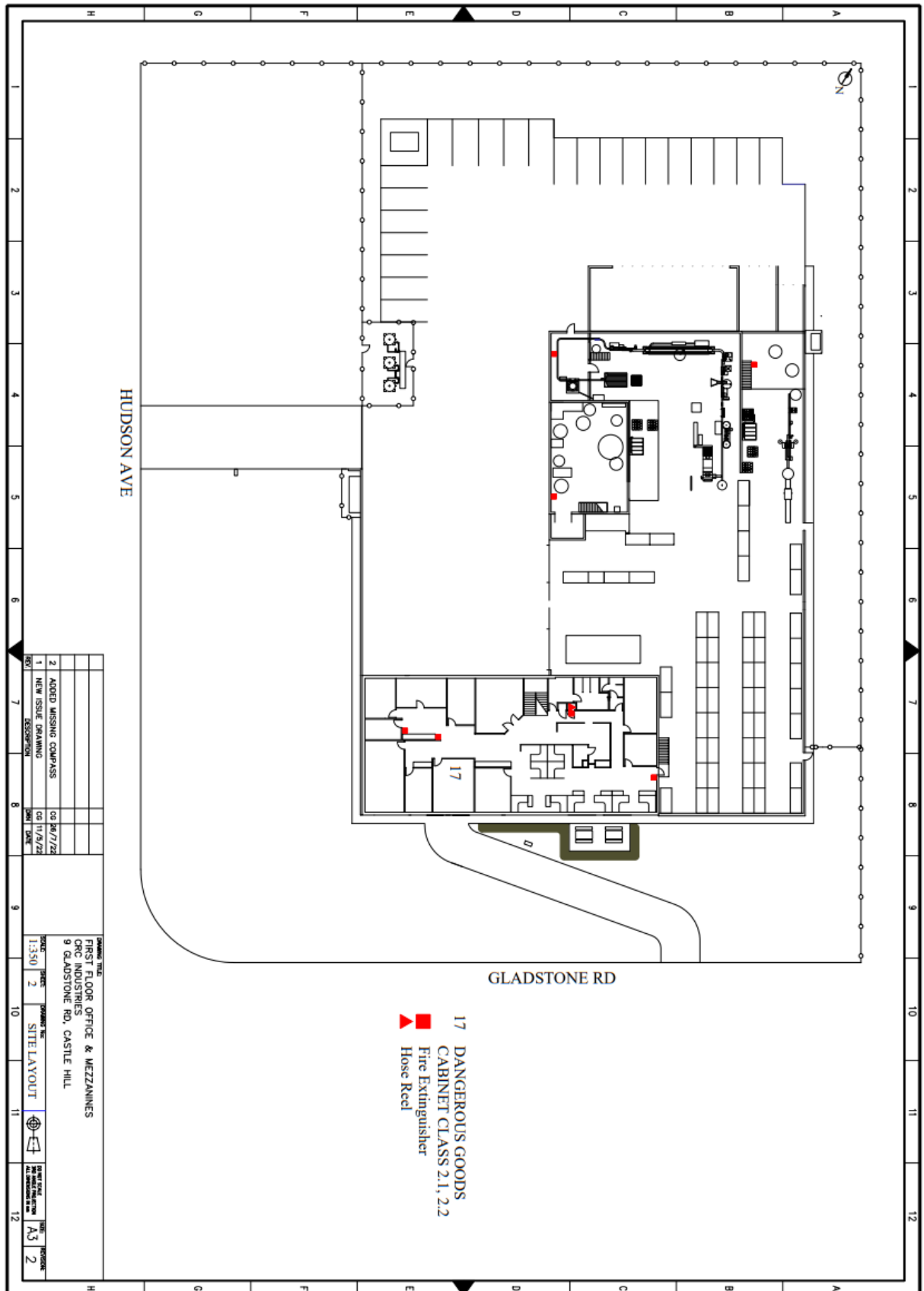
|   |   |                              |             |               |
|---|---|------------------------------|-------------|---------------|
|  | Pollution Incident Response Management Plan | Effective Date:<br>July 2022 | Version: 13 | Page 16 of 22 |
|   | Printed documents are uncontrolled          |                              |             |               |



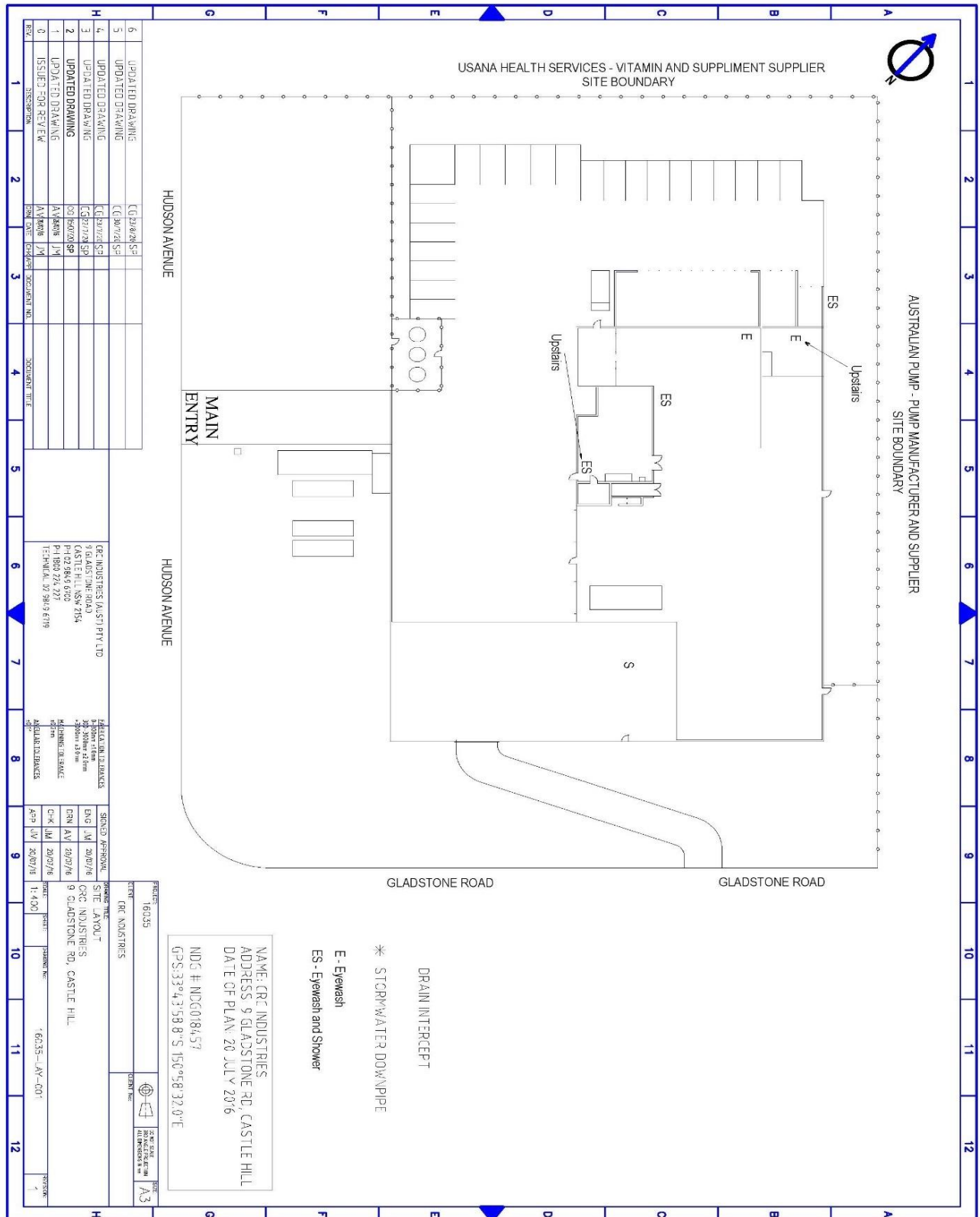
- **Appendix 3 - Drainage & Stormwater Drain Intercept Point**



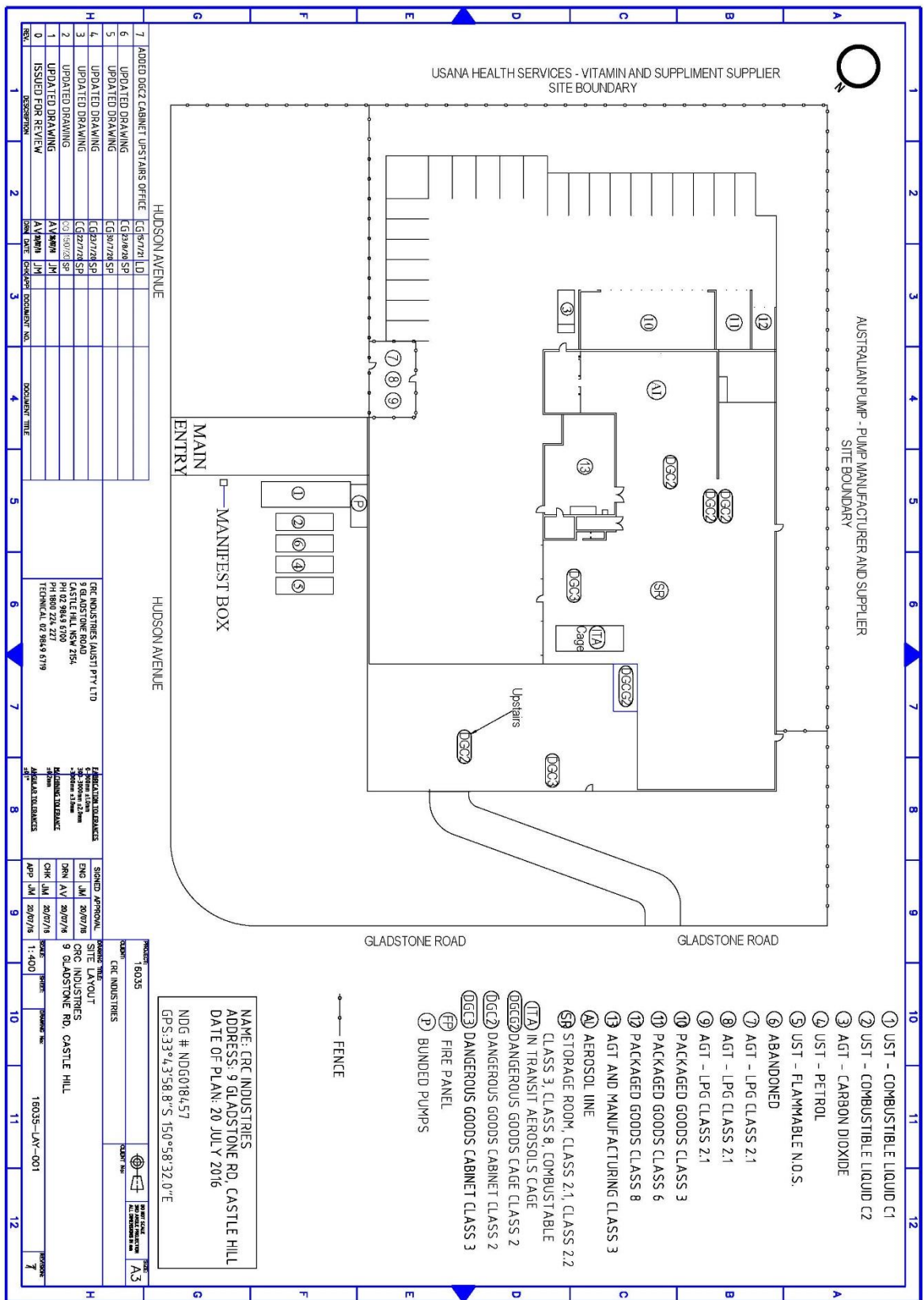
- Appendix 4 – Emergency Response Equipment



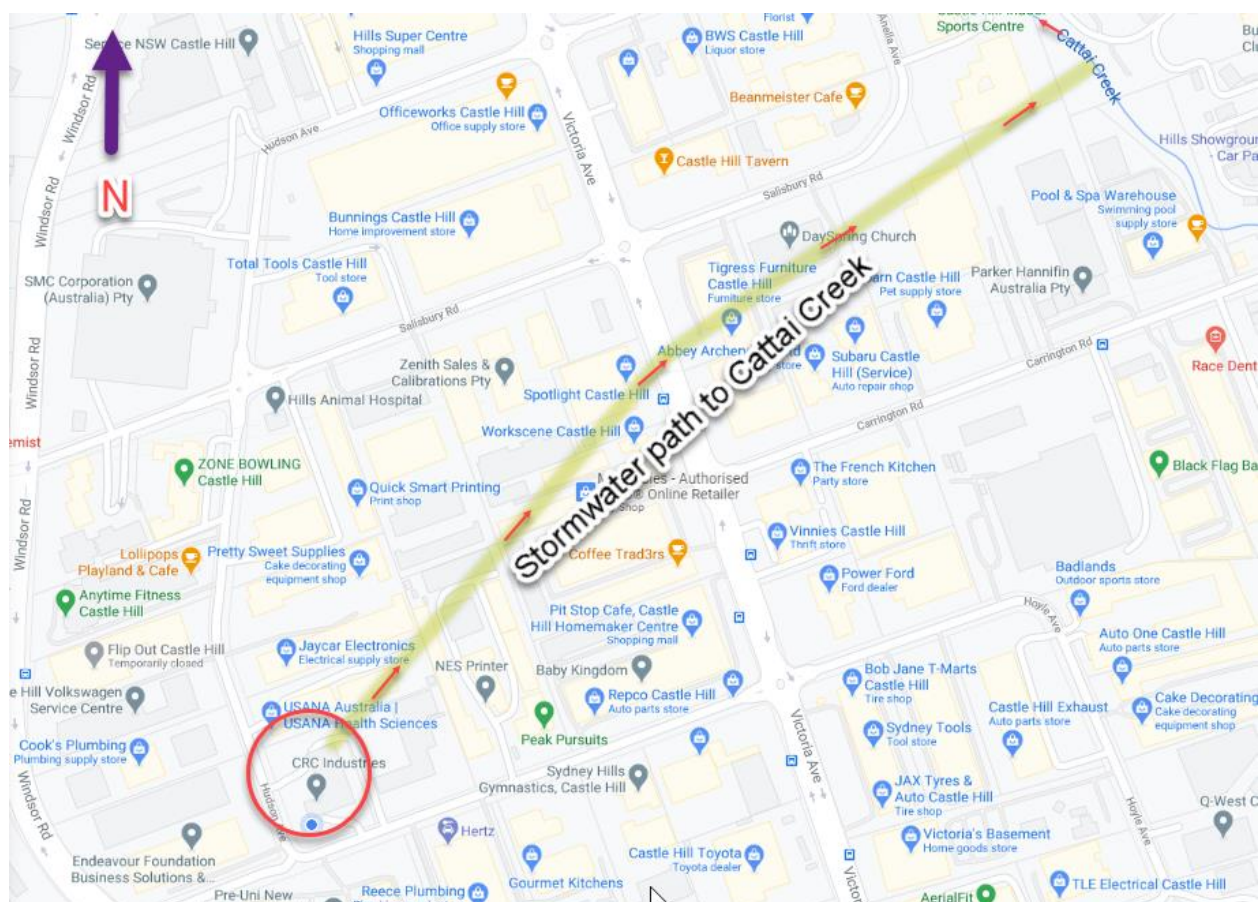
• Appendix 5 - Eyewash and Emergency Shower Locations



• Appendix 6 – Location of Potential Pollutants



- **Appendix 7 – Storm Water Entry to Local Creek**



- **Appendix 8**

### **PIRMP Reviews Records**

| <b>Reviewed By</b> | <b>Reviewed Date</b> |
|--------------------|----------------------|
| Richard Warren     | 1 March 2012         |
| Phillip Mulligan   | February 2013        |
| Phillip Mulligan   | January 2014         |
| Richard Warren     | March 2015           |
| Richard Warren     | November 2015        |
| Richard Warren     | February 2016        |
| Richard Warren     | March 2017           |
| Richard Warren     | July 2018            |
| Alen Rogosic       | February 2019        |
| Colin Gurney       | 16 April 2020        |
| Colin Gurney       | 23 March 2021        |
| Lyn Darius         | 15 July 2021         |
| Lyn Darius         | 26 July 2022         |
|                    |                      |
|                    |                      |





## **PIRMP Test Records**

All test records details are recorded in the compliance software.

| <b>Tested By</b>           | <b>Tested Date</b> |
|----------------------------|--------------------|
| Richard Warren             | 1 March 2012       |
| Phillip Mulligan           | February 2013      |
| Phillip Mulligan           | January 2014       |
| Richard Warren             | March 2015         |
| Richard Warren             | March 2016         |
| Richard Warren             | February 2017      |
| Richard Warren             | July 2018          |
| Alen Rogosic               | August 2019        |
| Emily Blair-Hickman        | 6 August 2020      |
| Lyn Darius<br>Colin Gurney | 15 July 2021       |
| Lyn Darius<br>Colin Gurney | 28 July 2022       |
|                            |                    |
|                            |                    |

